# PRIVACY POLICY

Please read this privacy notice ("Privacy Notice") carefully as it describes our collection, use, disclosure, retention and protection of your personal information. This Privacy Notice applies to any website, application or service which references this Privacy Notice. Where you provide us with or we collect your personal information in any of the ways described in section 2 below, you agree that we may collect, store and use it: (a) in order to perform our contractual obligations to you; (b) based on our legitimate interests for processing (i.e. for internal administrative purposes, data analytics and benchmarking (see section 3 below for more information), direct marketing, maintaining automated back-up systems or for the detection or prevention of crime); or (c) based on your consent, which you may withdraw at any time, as described in this Privacy Notice.

This Privacy Notice may be relevant to you even if you are not a customer or direct contact of ours, and have never used a website, application or service of ours. We may have your personal information because we have received it from a user of a website, application or service of ours.

**Brexit**: references in this Privacy Notice to "GDPR" will include any "UK GDPR" created by the UK Data Protection Act 2018 on the UK's exit from the European Union.

## 1. Who we are

This Privacy Notice applies to all products, applications and services offered by ECOM Software Limited (Company Number NI37779) whose registered office is at the Innovation Centre, Queens Road, Belfast, County Antrim BT3 9DT.

## 2. How we collect information

To the extent permissible under applicable law, we collect information about you and any other party whose details you provide to us when you:

- register to use our websites, applications or services; this may include your name (including business name), address, email address and telephone number. We may also ask you to provide additional information about your business and your preferences;
- place an order using our websites, applications or services; this may include your name (including business name), address, contact (including telephone number and email address) and payment details;
- use our applications, which may include the collection of metadata;
- complete online forms (including call back requests), take part in surveys, post on our message boards, post any blogs, download information such as white papers or other publications or participate in any other interactive areas that appear on our website or within our application or service;
- interact with us using social media;
- provide your contact details to us when registering to use or accessing any websites, applications or services we make available or when you update those details; and
- contact us offline, for example by telephone, fax, SMS, email or post.

We also collect information from your devices (including mobile devices) and applications you or your users use to access and use any of our websites, applications or services (for example, we may collect the device identification number and type, location information and connection information such as statistics on your page views, traffic to and from the sites, referral URL, ad data, your IP address, your browsing history and your web log information). We may do this using cookies or similar technologies (as described in section 11 below).

We may enhance personal information we collect from you with information we obtain from third parties that are entitled to share that information; for example, information from credit agencies, search information providers or public sources (e.g. for customer due diligence purposes), but in each case as permitted by applicable laws.

**Providing us with information about others**

When you subscribe to use our application services you are responsible for the input of your content and your data which may be collected, stored and processed as a result of your use of our application services. You will be the Data Controller, and we will be a Data Processor acting on your instructions.

Where you are collecting, storing and processing your content, you will determine the purposes for which and the manner in which that Personal Data will be processed. You will own all rights, title and interest to all of your content and will have sole responsibility for the legality, reliability, integrity, accuracy and quality of your content. You will also be responsible for:

- ensuring that you are entitled to transfer the relevant personal data to us, so that we may lawfully process and transfer such personal data on your behalf.
- ensuring that the relevant third parties have been informed of, and have given their consent to such use, processing and transfer as required by all applicable data protection legislation.

## 3. How we use your information

To the extent permissible under applicable law, we use your information to:

- provide any information and services that you have requested or any applications or services that you have ordered;
- compare information for accuracy and to verify it with third parties;
- provide, maintain, protect and improve any applications, products, services and information that you have requested from us;
- manage and administer your use of applications, products and services you have asked us to provide;
- manage our relationship with you (for example, customer services and support activities);
- monitor, measure, improve and protect our content, website, applications and services and provide an enhanced, personal, user experience for you;
- provide you with any information that we are required to send you to comply with our regulatory or legal obligations;
- comply with any other of our regulatory or legal obligations;
- detect, prevent, investigate or remediate, crime, illegal or prohibited activities or to otherwise protect our legal rights (including liaison with regulators and law enforcement agencies for these purposes);
- contact you to see if you would like to take part in our customer research (for example, feedback on your use of our applications, products and services);
- to monitor, carry out statistical analysis and benchmarking, as permitted by law and in accordance with the “Data analytics and benchmarking” section below ;
- deliver targeted advertising, marketing (which may include in-product messaging) or information to you which may be useful to you, based on your use of our applications and services;
- deliver joint content and services with third parties with whom you have a separate relationship (for example, social media providers); and

- provide you with location-based services (for example, advertising and other personalised content), where we collect geo-location data.

To the extent permitted by applicable law, we retain information about you after the termination of any contract you hold with us. This information will be held and used for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.

Our website, applications (including mobile applications) and services may contain technology that enables us to:

- check specific information from your device or systems directly relevant to your use of the websites, applications or services against our records to make sure the websites, applications or services are being used in accordance with our end-user agreements and to troubleshoot any problems;
- obtain information relating to any technical errors or other issues with our website, applications and services;
- comply with our legal or regulatory obligations;
- collect information about how you and users use the functions of the features of our website, applications and services; and
- gather statistical information about the operating system and environment from which you access our applications or services.

You can manage your privacy settings within your browser or our applications and services (where applicable).

We may monitor and record our communications with you, including e-mails and phone conversations. Information which we collect may then be used for training purposes, quality assurance, to record details about our website, applications and services you order from us or ask us about, and in order to meet our legal and regulatory obligations generally.

## 4. Data analytics, and benchmarking

We may use information generated and stored during your use of our services for our legitimate business interests to enable us to give you the best service and/or solutions and the best experience. Because we are committed to innovation, this use of information might involve the use of statistical analysis, benchmarking and forecasting services, predictive analysis and artificial intelligence/machine learning.

For instance we may:

- carry out research and development to improve our services, products and applications;
- develop and provide new and existing functionality and services (including statistical analysis, benchmarking, insights, receipt recognition and cashflow forecasting services); and
- provide you with location-based services (for example location relevant content) where we collect geo-location data to provide a relevant experience.

## 5. Sharing your information

We may share your information with:

- our service providers and agents (including their sub-contractors) or third parties which process information on our behalf (e.g. internet service and platform providers, payment processing providers and those organisations we engage to help us send communications to you) so that they may help us to provide you with the applications, products, services and information you have requested or which we believe is of interest to you. We have contracts in place with them which means that they cannot do anything with your personal data unless we have instructed them to. They will hold it securely and only retain it for the period we instruct them to;
- third parties used to facilitate payment transactions, for example clearing houses, clearing systems, financial institutions and transaction beneficiaries;
- credit reference and fraud prevention agencies;
- Government bodies, regulators and any other third party necessary to meet Sage Group's legal and regulatory obligations;
- law enforcement agencies so that they may detect or prevent crime or prosecute offenders;
- any third party in the context of actual or threatened legal proceedings, provided we can do so lawfully (for example in response to a court order);
- any third party in order to meet our legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts;
- another organisation if we sell or buy (or negotiate to sell or buy) any business or assets;
- another organisation to whom we may transfer our agreement with you; and
- Government departments where reporting is mandatory under applicable law.

We may share non-personally identifiable information about the use of our website, applications, products or services publicly or with third parties but this will not include information that can be used to identify you.

## 6. Marketing

From time to time, we may use your information to contact you with details about our applications, products and services which we feel may be of interest to you. We or they may wish to contact you for this purpose by telephone, post, SMS or email. You have the right at any time to stop us from contacting you for marketing purposes. If you wish to exercise these rights you can do so by sending us an email info@ecomsoftware.com. You can also unsubscribe from any email marketing using the links provided in the emails we send to you.

## 7. Your information and your rights

If you are based within the EEA or within another jurisdiction having similar data protection laws, in certain circumstances you have the following rights:

- the right to be told how we use your information and obtain access to your information;
- the right to have your information rectified or erased or place restrictions on processing your information;
- the right to object to the processing of your information e.g. for direct marketing purposes or where the processing is based on our legitimate interests;
- the right to have any information you provided to us on an automated basis returned to you in a structured, commonly used and machine-readable format, or sent directly to another company, where technically feasible ("data portability");
- where the processing of your information is based on your consent, the right to withdraw that consent subject to legal or contractual restrictions;

- the right to object to any decisions based on the automated processing of your personal data, including profiling; and
- the right to lodge a complaint with the supervisory authority responsible for data protection matters (e.g. in the UK, the Information Commissioner's Office).

If we hold any information about you which is incorrect or if there are any changes to your details, please let us know so that we can keep our records accurate and up to date.

If you withdraw your consent to the use of your personal information for purposes set out in our Privacy Notice, we may not be able to provide you with access to all or parts of our website, applications, and services.

We will retain your personal information for the duration of our business relationship and afterwards for as long as is necessary and relevant for our legitimate business purposes as otherwise permitted by applicable laws and regulations. Where we no longer need your personal information, we will dispose of it in a secure manner (without further notice to you).

## 8. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. However we will not reduce your rights under this Privacy Notice. We will always update this Privacy Notice on our website, so please try to read it when you visit the website (the 'last updated' reference tells you when we last updated this Privacy Notice).

## 9. Security and storage of information

We will keep your information secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental loss, destruction or damage. We will do our best to protect your personal information but we cannot guarantee the security of your information which is transmitted to our website, applications or services or to other website, applications and services via an internet or similar connection. If we have given you (or you have chosen) a password to access certain areas of our websites, applications or services please keep this password safe – we will not share this password with anyone.

If you believe your account has been compromised, please contact us at info@ecomsoftware.com.

## 10. Other sites and social media

If you follow a link from our website, application or service to another site or service, this Privacy Notice will no longer apply. We are not responsible for the information handling practices of third party sites or services and we encourage you to read the privacy notices appearing on those sites or services.

Our websites, applications or services may enable you to share information with social media sites, or use social media sites to create your account or to connect your social media account. Those social media sites may automatically provide us with access to certain personal information retained by them about you (for example any content you have viewed). You should be able to manage your privacy settings from within your own third party social media account(s) to manage what personal information you enable us to access from that account.

## 11. Cookies

We use cookies to distinguish you from other users of our websites. This helps us to provide you with a good experience when you use our websites and also allows us to improve our websites.

We use the following cookies for the following purposes:

Strictly necessary cookies. These are cookies that are required for the operation of our websites. They include, for example, cookies that enable you to log into secure areas of our websites.

Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our websites when they are using it. This helps us to improve the way our websites work, for example, by ensuring that users are finding what they are looking for easily.

Functionality cookies. These are used to recognise you when you return to our websites. This enables us to personalise our content for you and remember your preferences.

Targeting cookies. These cookies record your visit to our websites, the pages you have visited and the links you have followed to allow us to improve the page layout and navigation preferences.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our websites.

In order to optimise our service we apply Google Analytics and our own statistical analyses.

Google Analytics is a web analysis service provided by Google, which is used for purposes of market research and ensuring that the service meets user requirements. Google Analytics uses "cookies", which are placed on your computer to make it possible to analyse how you make use of the service. The information generated by the cookies about your use of the service (including your pseudonymised IP address) is as a rule transmitted to and stored by Google on servers in the United States . Google uses this information in order to evaluate your use of the service and to create reports on activities for the operator of the service. Google may also transmit this information to third parties if this is prescribed by law, or if third parties process the data on behalf of Google. On no account will Google connect your IP address with other Google data. At https://tools.google.com/dlpage/gaoptout?hl=en-GB you can, with effect for the future, opt out of the recording and saving of your data at any time. In addition, we use Google Analytics remarketing and reports on demographic features and interests in order to display to website visitors relevant advertisements on the partner websites of the Google display and search network. The saving of cookies makes it possible to analyse user behaviour and activate interest-based advertising.

## 12. Further information

If you have any queries about how we treat your information, the contents of this Privacy Notice, your rights under local law, how to update your records or how to obtain a copy of the information that we hold about you, please write to our Data Protection Officer, at ECOM Software Limited, Innovation Centre, Queens Road, Belfast, County Antrim BT3 9DT or send an email to info@ecomsoftware.com